

supported by a filter frame, a filter rack supporting the filter frame and a filter rack comprising elongated parallel members wherein a spring connected to the filter rack and urging the members apart from each other.

Applicant respectfully traverses both the rejection of all claims under 35 U.S.C. Section 103 and the statement above as made by the Examiner. Neither Chiang et al. nor Hegan, whether taken individually or in combination, disclose the filter rack as claimed in claims 1-20 of the application and as described in the Specification. In fact, neither Chiang et al. nor Hegan discloses both a filter rack and a filter rail as claimed.

More specifically with regard to Chiang et al., the only spring or springs in Chiang et al. are the springs 23 which are secured in the retainer 20 and engaged with the filter device 30. This spring does not connect to a filter rack and urge two elongated and substantially parallel side members apart from each other as claimed. Chiang et al. does not and cannot meet this claim element.

More specifically with regard to Hegan, the Examiner relies on spring 21. However, Hegan's description relative to the spring describes a finger piece 20 composed of a straight section of stiff round wire bent at one end to form a loop, where the loop is urged against the frame by the spring 21 (see Hegan, column 2, lines 6-13). Hegan does not meet the requirement of two elongated and substantially parallel side members urged apart by a first spring connected to the filter rack. The claimed invention is therefore novel in view of Hegan.

Inasmuch as neither reference discloses the claimed arrangement as described above, the combination of Chiang et al. and Hegan cannot disclose the claimed arrangement. Moreover, there is no suggestion or reason in either Chiang et al. or Hegan to make any modification which might result in the claimed invention, and the claimed invention is submitted to be novel and patentable in view of Chiang et al. and Hegan whether taken individually or in combination.

The Examiner is requested to review and withdraw the rejection of claims 1-20 under 35 U.S.C. Section 103(a) in view of the proposed combination of Chiang et al. and Hegan. If the Examiner maintains the rejection, the Examiner is requested to clarify to the applicant, by specifying the reference numerals in Chiang et al. and

Hegan, upon which the Examiner is relying for each specific element of the claims in making the rejection, particularly with regards to claims 1, 2, 12 and 18. Applicant strongly disagrees with the Examiner's interpretation of these references and is of the opinion that the Examiner will not be able to provide the requested explanation. Absent such explanation to explain the Examiner's rejections, the Examiner is requested to allow the application to proceed to immediate allowance.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "William O'Driscoll". The signature is written in a cursive, flowing style with a large initial 'W'.

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